

## **Exhibit A**

ONE RODNEY SQUARE  
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WILMINGTON, DELAWARE 19899-0636  
—  
(302) 651-3000

March 10, 2005

**VIA FACSIMILE AND FIRST CLASS MAIL**

Nathan W. Kellum, Esq.  
P.O. Box 11159  
Memphis, Tennessee 38111

**Re: Dobrich, et al., v. Walls, et al., D. Del. No. 05 - 120**

Dear Mr. Kellum:

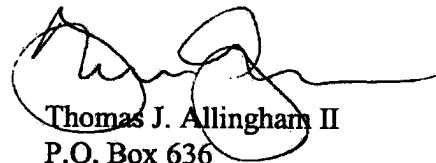
As you are aware, we have recently filed a lawsuit against the Indian River School District (the "District"), the Indian River School Board, Superintendent Lois M. Hobbs, Assistant Superintendent Earl J. Savage, and the Indian River School Board members in their official and personal capacities (collectively, the "Defendants"), over the District's religious practices (the "Litigation"). This letter is to remind you, and the Defendants, of your duty to preserve evidence relevant to pending or reasonably foreseeable litigation. This duty to preserve prohibits the destruction, significant alteration or the failure to preserve evidence relevant to the Litigation. Failure of the Defendants to fulfill their duties could result in sanctions, including a default judgment against the Defendants, in the Litigation.

All evidence related to the District's prayer policies must be preserved so as not to prejudice our clients' interests. Relevant evidence would include (without limitation) not only written documents, such as letters, reports and memoranda, but also electronic data, such as e-mail, computer hard drives or computer backups, that relate to the District's religious practices. As some of the Defendants have indicated in their statements to the press that they have seen litigation as a possibility since at

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least August 4, 2004, we hope that the Defendants have preserved all relevant evidence.

Very truly yours,



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cc: James D. Griffin, Esq.  
Superintendent Lois M. Hobbs  
Assistant Superintendent Earl J. Savage  
Indian River School Board Members